

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MICHAEL BUSH; LINDA TAYLOR;)
LISA TIERNAN; KATE HENDERSON;)
ROBERT EGRI; KATALIN EGRI;)
ANITA LOPEZ; MONICA GRANFIELD;)
ANN LINSEY HURLEY; IAN SAMPSON;)
SUSAN PROVENZANO; and JOSEPH PROVENZANO,)
pro se Plaintiffs,)
VS.) C.A. NO. 1:21-cv-11794-ADB
LINDA FANTASIA; MARTHA FEENEY-PATTEN;)
ANTHONY MARIANO; CATHERINE GALLIGAN;)
JEAN JASAITIS BARRY; PATRICK COLLINS;)
DAVID ERICKSON; TIMOTHY GODDARD; and)
TOWN OF CARLISLE,)
Defendants.)

**MOTION OF DEFENDANTS FOR LEAVE TO EXTEND TIME
TO RESPOND TO COMPLAINT**

The defendants, Linda Fantasia, Martha Feeney-Patten, Anthony Mariano, Catherine Galligan, Jean Jasaitis Barry, Patrick Collins, David Erickson, Timothy Goddard and Town of Carlisle, hereby move, pursuant to Fed. R. Civ. P. 6(b)(1)(A), for leave to extend the time within which they must file an answer or otherwise respond to plaintiffs' Complaint by an additional thirty (30) days, up to and including January 5, 2022. As grounds therefor, the defendants state that undersigned counsel was recently appointed to represent them in this matter. Due to such recent appointment, his professional obligations in several other legal matters, and the upcoming holidays, defense counsel requires additional time within which to investigate the allegations of plaintiffs' Complaint and to prepare an appropriate response to same on defendants' behalf.

WHEREFORE, the defendants, Linda Fantasia, Martha Feeney-Patten, Anthony Mariano, Catherine Galligan, Jean Jasaitis Barry, Patrick Collins, David Erickson, Timothy Goddard and

Town of Carlisle, hereby request that this Honorable Court extend the time within which they must answer or otherwise respond to plaintiffs' Complaint up to and including January 5, 2022.

Respectfully submitted,

The Defendants,

LINDA FANTASIA, MARTHA FEENEY-PATTEN,
ANTHONY MARIANO, CATHERINE GALLIGAN,
JEAN JASAITIS BARRY, PATRICK COLLINS,
DAVID ERICKSON, TIMOTHY GODDARD and
TOWN OF CARLISLE,

By their Attorneys,

PIERCE DAVIS & PERRITANO LLP

/s/ John J. Davis

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Dated: December 2, 2021

LOCAL RULE 7.1 CERTIFICATE

I hereby certify that, on December 2, 2021, I conferred with *pro se* plaintiff, Michael Bush, by telephone in an effort to resolve or narrow the issues regarding this request. I also confirmed our telephone conversation via email. Mr. Bush is the only plaintiff whose telephone number and email address is listed on the Court docket.

/s/ John J. Davis

John J. Davis, Esq.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing, filed through the Electronic Case Filing System, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and that a paper copy shall be served upon those indicated as non-registered participants on December 2, 2021 as follows:

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/s/ John J. Davis

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